

Exhibit 2:

Excerpts from Deposition of Edward Yearta

1 IN THE DISTRICT COURT
2 FOR THE UNITED STATES OF AMERICA
3 WESTERN DISTRICT OF TENNESSEE

4 **EDWARD ALAN YEARTA,**
5 Plaintiff,

CIVIL ACTION NO.:
2:17-cv-2117 SHM-egb

6 vs.
7 **AMUSEMENTS OF AMERICA,**
8 **INC.; DELTA FAIR, INC.;**
9 **UNIVERSAL FAIRS, LLC;**
10 **and BELLE CITY**
11 **AMUSEMENTS, INC.,**

12 Defendants.

13 **AMUSEMENTS OF AMERICA,**
14 **INC.,**

VOLUME I OF IV

15 Crossclaim Plaintiff,

16 vs.

17 **BELLE CITY AMUSEMENTS,**
18 **INC.,**

19 Crossclaim Defendant.

20 *****

21 ORAL VIDEO DEPOSITION OF

22 EDWARD YEARTA

23 MAY 3RD, 2018

24 *****

25 ORAL VIDEO DEPOSITION of EDWARD YEARTA taken
in the above-styled and numbered cause on May
3rd, 2018, from 8:40 a.m. until 7:33 p.m. before
Carol P. Kellerman, Certified Court Reporter in
and for the State of Georgia, in the conference
room at 327 North Ashley Street and at 1564
Baytree Road, Valdosta, Georgia.

Carol P. Kellerman, C.C.R.
KELLERMAN COURT REPORTING, INC.
Phone No.: (229) 245-0317

1 Q. How -- how does it become locked into
2 place?

3 A. Wherever they pull it up to the mark.

4 Q. Okay. Is there something that then
5 kind of connects it to the ground?

6 A. A ground wire I reckon.

7 Q. Okay. Do you recall seeing whether or
8 not the generator had ground wire?

9 A. It was grounded, but I don't know how
10 -- if it was grounded right.

11 Q. Okay. But you recall that it was
12 grounded?

13 A. Yes.

14 Q. Okay.

15 MS. TULLIS: Those are all the
16 questions I have. Thank you.

17 MS. NELSON: I have actually some
18 follow-up. I'm sorry.

19 MR. TEITENBERG: I think you've
20 got about six minutes.

21 (Court Reporter's Note: There was
22 a brief discussion held off of the
23 record.)

24 **RE-EXAMINATION**

25 BY MS. NELSON:

1 Q. So, Mr. Yearta, in response to Ms.
2 Tullis' question just a moment ago about whether
3 the generator was grounded, you responded that,
4 yes, it was grounded.

5 A. I don't know --

6 MR. TEITENBERG: Objection, form.

7 THE DEPONENT CONTINUED:

8 A. I don't know if it was grounded right.
9 But it was grounded.

10 Q. (By Ms. Nelson) Explain that to me.

11 A. I don't know if the rod was drove in
12 the ground deep enough or not.

13 Q. Did you see grounding rods at that
14 generator truck?

15 A. Yes.

16 Q. What did they look like?

17 A. Copper wire.

18 Q. Explain that to me.

19 A. Copper rods with a clamp on it that's
20 got a wire, a grounding rod, connected to it.

21 Q. And do you know who placed those rods?

22 A. No, I don't.

23 Q. And were they driven into the ground?

24 A. Yes, but I don't know if they was deep
25 enough.

1 Q. Can you show me?

2 MS. NELSON: May I see the last
3 exhibit please?

4 UNIDENTIFIED PERSON: (Complies.)

5 THE DEPONENT CONTINUED:

6 A. Where they was at?

7 Q. (By Ms. Nelson) Yes.

8 A. Probably right here.

9 Q. You just said that they were probably
10 right there.

11 A. They're somewhere right there in front
12 of the box, yes.

13 Q. Are you certain that you saw them?

14 A. Yes. I wouldn't have hooked up to it
15 if it wasn't grounded.

16 Q. How many rods were there?

17 A. All I seen was -- I mean, one that I
18 know of. I don't know if they grounded it twice
19 or not. I know I seen one.

20 Q. How many grounding rods are usually
21 used to your --

22 A. Usually --

23 Q. -- to your knowledge?

24 A. -- one -- one big one. Usually one
25 good sized one. It's according to how deep they